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11 *Attorneys for Defendant, Sentinel Insurance Company, Ltd. and The Hartford Financial Services*
12 *Group, Inc.*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 GILBERT ARCHULETA,
16
17 Plaintiff,
18 vs.

19 THE HARTFORD FINANCIAL SERVICES
20 GROUP, INC.; SENTINEL INSURANCE,
21 LLC; SENTINEL INSURANCE COMPANY,
22 LTD., 1 SOURCE INSURANCE GROUP;
23 SILVER STATE HYDRAULIC SERVICES,
24 INC.; and DOES I – V; ROE
25 CORPORATIONS I – V; ROE EMPLOYEES
26 I – V; ROE WHOLESALE I – V; and ROE
27 RETAILER I - V, inclusive,
28 Defendants.

Case No.: 2:21-cv-01310-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO PLAINTIFF’S MOTION FOR
REMAND [ECF No. 13]**

[Second Request]

Plaintiff, Gilbert Archuleta (“Plaintiff”) and Defendant, Sentinel Insurance Company, Ltd.
 (“Sentinel”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On March 23, 2021, Plaintiff filed its Complaint in Eighth Judicial District Court, Case
No. A-21-831643-C [ECF No. 1-2];
2. On July 9, 2021, Sentinel Petition for Removal to this Court [ECF No. 1];
3. On August 2, 2021, Plaintiff filed a Motion for Remand [ECF No. 13];
4. Sentinel’s deadline to respond to Plaintiff’s Motions for Remand is currently August
30, 2021;

- 1 5. Sentinel's counsel is requesting an extension until Tuesday, September 7, 2021, to file
2 its response to the pending Motions for Remand;
- 3 6. This is Sentinel's second requested extension. The first 14-day extension was
4 requestee because Sentinel's lead counsel was on a family vacation when the Motion
5 for Remand was filed, and the associate assigned to the file was on maternity leave.
6 This extension is requested because Sentinel and its counsel are still in process of
7 gathering information necessary to respond to the motion to dismiss. Due in part to
8 unanticipated scheduling conflicts, the process is taking longer than originally
9 anticipated. Sentinel estimates it may need up to another week, which would put the
0 new date to respond at September 7, 2021 given Labor Day.
- 1 7. This request is made in good faith and not for purposes of delay. Plaintiff does not
2 oppose the requested extension.

3 **IT IS SO STIPULATED.**

4 DATED this 30th day of August, 2021.

DATED this 30th day of August, 2021.

5 WRIGHT, FINLAY & ZAK, LLP

CHRISTENSEN LAW OFFICES, LLC

6 /s/ Darren T. Brenner

/s/ Dawn Hooker

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Las Vegas, NV 89107

21 *Financial Services Group, Inc..*

Attorney for Plaintiff, Gilbert Archuleta

22 **IT IS SO ORDERED.**

23 Dated this 30th day of August, 2021.

24 
25 UNITED STATES DISTRICT COURT JUDGE
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